

Rogaczewski, Joshua

From: Darcie Brault <DBrault@MichWorkLaw.com>
Sent: Friday, October 18, 2013 8:38
To: Burchfield, Bobby; Capotosto, Laura; Rogaczewski, Joshua
Cc: David Radtke; Sandy Cowell
Subject: Schedule

Bobby,

We do believe that an extension of more than 30 days is necessary, particularly when your expert has only one day available for deposition. However, I guess we'll take what we can get – your proffered 30 day extension – and see if we can fit everything in. If not, we reserve the right to ask for more time later. I would, again, point out that 60 days would be better, especially given the year-end holidays, and ask that you reconsider. I am out of the office until next week. I will ask my secretary to prepare a proposed stipulation. If you can see your way to 60 days, please let me know.

I do not believe it will be effective to unilaterally set depositions and then wait for objections. If we are going to work around our arbitration/bargaining schedules and Mr. Macey's schedule, it will require a more hands-on approach. I suggest we set a time for a conference call next week. I am available on Wednesday afternoon and Thursday morning at 8 am.

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